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AIR OPERATING PERMIT No. 000080-9

In compliance with the provisions of The State of Washington
Clean Air Act Chapter 70.94 Revised Code of Washington

Weyerhaeuser Pulp Mill
1701 Front Street
P. O. Box 1000
Cosmopolis, Washington 98537

is authorized to operate in accordance
with the terms and conditions
of this permit.

Issued by:

State of Washington
DEPARTMENT OF ECOLOGY
300 Desmond Drive
P.O. Box 47600
Olympia, Washington 98504-7600

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INTRODUCTION, LEGAL AUTHORITY, AND FACTUAL BASIS

This Air Operating Permit is authorized under the Operating Permit Regulation, Chapter 173-401 WAC. All sources subject to this regulation shall have a permit to operate that assure compliance by the source with all applicable requirements. [WAC 173-401-100(2)] Weyerhaeuser Company's Pulp Mill at Cosmopolis, Washington (Weyerhaeuser) requires a Title V Air Operating Permit because it emits or has the potential to emit one hundred tons per year or more of air pollutants. [WAC 173-401-300(1)] To fulfill these conditions the air-operating permit is being issued to Weyerhaeuser by the Department of Ecology. The provisions of this permit describe the emissions limitations, operating requirements, monitoring and recording requirements, and reporting frequencies for the permitted source.

During the drafting of this permit, Ecology has attempted to incorporate requirements using the exact language of the law, regulation or order. In some cases, this has not been possible. Where there is a difference in language, this difference is presented in the permit only for clarification of the underlying requirement. The legal requirement remains the underlying applicable requirement cited in the "Applicable Requirements" column of the tables and the citations contained in brackets at the end of each requirement. Any conflict between the permit and an underlying requirement will be resolved by referring to the cited applicable requirement. Note that although one set of monitoring and reporting requirements will address several applicable requirements, the source remains subject to all cited applicable requirements. Unless otherwise stated, the effective date of referenced regulations or statutes is that of the provision in effect on the date of permit issuance.

The Title V Air Operating Permit consists of all parts of this assembled document including all Appendices, but does not include the accompanying Support Document

The definition of terms contained in WAC 173-401-200, and as defined in all referenced regulations, apply to this permit unless otherwise defined in the permit.

Any federal test method referenced, unless specifically stated otherwise within the body of the permit, is that which is contained in 40 CFR part 60, appendix A. Any state test method referenced, unless specifically stated otherwise within the body of the permit, is that which is contained in the "Ecology Source Test Manual" as of July 12, 1990.

EMISSION UNIT SPECIFIC REQUIREMENTS

The emission units covered by sections A through F are subject to the individual emission limit under each section. These units are also subject to the facility-wide applicable requirements and the associated monitoring, recordkeeping and reporting requirements of that section of the permit. Unless specified otherwise, the basis of authority for the type and frequency of monitoring imposed in conditions A through F is WAC 173-401-615. All conditions in A through F are federally enforceable under the federal Clean Air Act except those noted as state only.

Refer to Appendix C for emission estimate algorithms. These algorithms set forth the manner by which emissions are calculated for those requirements for which the Reference Method itself does not directly result in an emission estimate. Unless otherwise required by the applicable requirement, minor modifications to the test method may be used with the advanced approval of Ecology. Failure to obtain prior written approval for any test changes may invalidate the test result(s).

A. Recovery Boilers No. 1, No. 2, and No. 3 common stack (AP-10)

	Parameter	Limit Shall not exceed	Monitoring & Reporting	Applicable Requirements
1.	Particulate	0.10 gr/dscf @ 8 % O ₂	The permittee shall perform and record DOE Method 5 source test once per month. The permittee shall perform the DOE Method 5 source test above 80 % the previous month's pulp production. The permittee shall report the results of the DOE method 5 source test on the monthly air emission report. See A.4 for operational requirement that is intended to indicate compliance. The averaging time is the time that each test is run in order to obtain the required volume of sample. The minimum averaging time is 60 minute.	WAC 173-410-040(2)(a) and Order No. DE 95AQ-I034 (Attachment B)
2.	Opacity	Average 35 % or less for any six (6) consecutive minutes in any one-hour period.	DOE Method 9B is the reference test method. See A.4 for operational requirements	WAC 173-410-040(3) and Order No. DE 95AQ-I034 (Attachment B)
3.	Sulfur dioxide	800 ppm hourly average	The permittee shall continuously monitor the concentration of sulfur dioxide from the recovery stack with EPA method 6C. The reference test method is EPA method 6C. The sulfur dioxide values shall be averaged on an hourly basis. The emission data shall be submitted monthly to DOE in the monthly air emission report. The daily hourly averages shall start on the clock hour at 0000 hours and end at 2400 hours daily.	WAC 173-410-040(d)
4.	Operation See A1 and A2 above	--	<u>Operational Requirement:</u> The permittee shall operate the recovery furnaces system absorption tower's circulation pumps continuously except for pump maintenance to indicate compliance of the pollution control device. During any maintenance shutdown, one of the pumps may be out of service for periods no greater than 72 hours. The permittee will be in violation of the permit, if more than one of the pumps is out of service at any one time or if the non-operating pump is out of service for greater than 72 hours. The absorption tower circulating pump's operation requirement is only applicable when burning spent sulfite liquors and/or wastewater treatment secondary sludges in the respective recovery furnaces No. 1, No. 2, and/or No. 3. Once per shift the operator shall take and record visual readings of how many pumps are in service. Failure to take corrective actions to bring the operational requirements back into its expected operational range in the 72 hours is a violation of WAC 173-410-040(4) and may be a violation of the underlying requirement.	Order No. DE 95AQ-I034(Attachment B); WAC 173-410-040(4) & 062(5)

Concentrated oxygen extraction liquor/Recovery furnace No. 1 and No. 2 (AP-10)				
	Parameter	Limit Shall not exceed	Monitoring & Reporting	Applicable Requirements
5.	Burning NCG's gasses	Directed to Recovery boiler No 1 and No. 2 except during startup, shutdowns, or emergencies. During shutdowns of one of the boiler, the NCG shall be routed to the operational boiler within one hour.	For safety reasons, during startup and emergency shutdowns, the NGG gasses may be vented to the cooling towers until the gases can be rerouted. Records shall be maintained showing NGC combustion status and boiler maintenance or emergencies shutdowns activities that interrupt NCG combustion. All NCG bypasses shall be recorded. All bypasses of NCG gasses greater than one hour shall be reported with the monthly air report.	Order No. 96AQ-I089 (Approval conditions A and B) issued under WAC 173-400-113
	Weak Oxygen Storage Tank (EV-21) and the COEL Storage Tank (EV-22)	--	Minimum record keeping: The permittee shall keep records of the dimensions and the analysis showing the capacity of Weak Oxygen Storage Tank (EV-21) and the COEL Storage Tank (EV-22) for the life of the vessels.	40 CFR §60.116b. (a) and (b).

The following **state-only** requirements are not federally enforceable under the federal Clean Air Act:

	Parameter	Limit Shall not exceed	Monitoring & Reporting	Applicable Requirements
6.	Sulfur dioxide	Average 360 ppm per hour.	See A3 for monitoring requirements.	DE 95AQ-I034 (Attachment B)
7.	TRS	17.5 ppm	The permittee shall continuously monitor and record the concentration of total reduced sulfur (TRS) compounds in the recovery furnace stack emission by referenced test method DOE method 12. The averaging period is daily. The permittee shall report the results of the monitoring to Ecology on the monthly emission report form.	WAC 173-410-040(5)

B. Hogged fuel dryer - A noncombustion source (HD-14)

	Parameter	Limit Shall not exceed	Monitoring & Reporting	Applicable Requirements
1.	Opacity	Average 20 % for any consecutive three (3) minutes period for any one hour	DOE test method 9 A is the referenced test method. The opacity shall be monitored yearly. See B.4 for minimum operating requirements that is intended to indicate compliance with the opacity limit.	WAC 173-400-040(1) and Order No. DE 95AQ-I034 (Attachment B)
2.	Particulate	0.1 gr/dscf uncorrected for oxygen	DOE test Method 5 shall be performed yearly. The permittee shall perform the Method 5 source test above 80 % the previous year's steam production. The averaging time is the time that each test is run in order to obtain the required volume of sample. The minimum averaging time is 60 minute. The particulate shall be monitored yearly. See B.4 for operational requirement that is intended to indicate compliance with the particulate limit.	WAC 173-400-060 and Order No. DE 95AQ-I034 (Attachment B)
3.	Sulfur dioxide	1,000 ppm uncorrected for oxygen 2 percent sulfur in fuel oil	The permittee shall certify to Ecology annually on the January monthly air emission reporting form that only diesel was burned during the preceding year. In the event that fuel oil is burned, the permittee shall certify that the fuel oil burned had a sulfur content of no greater than 2 percent.	WAC 173-410(1)(f) and Order No. DE 95AQ-I034 (Attachment B)
4.	Operation See B1 and B2 above	--	<p><u>Operational Requirement:</u> The permittee shall monitor and record the temperature at the inlet and outlet of cyclone No. 1, No. 2, and No. 3. The temperature (ΔT)</p> <ul style="list-style-type: none"> For cyclone No. 3 shall have an increase between the inlet and the outlet equal to or greater than 26 degrees Fahrenheit. For cyclone No. 2 shall have an increase between the inlet and the outlet equal to or greater than 9 degrees Fahrenheit. For cyclone No. 1 shall have an increase between the inlet and the outlet equal to or greater than 15 degrees Fahrenheit. <p><u>Corrective Action Requirement:</u> When the Permittee encounters conditions that do not meet the Operational Requirement above, Permittee shall, within the shortest practical time but within 4 hours, take Corrective Action or perform the applicable DOE test method except during startups or shutdowns while the system is stabilizing. The permittee shall report all instances where the facility operates without meeting the Operational Requirement except during startups or shutdowns while the system is stabilizing, and Corrective Action taken, on the facility's monthly air emission report. Failure to take corrective actions is a violation of WAC 173-410-040(4) and may be a violation of the underlying requirement.</p>	WAC 173-401-615(1)(c)

C. Hogged fuel boiler (Power boiler) (PH-34 & PH-42)

	Parameter	Limit (Shall not exceed)	Monitoring & Reporting	Applicable Requirements
1.	Sulfur dioxide	1,000 ppm @ 7 % O ₂ 2 percent sulfur in fuel oil	The permittee shall record the sulfur content of the fuel oil being burned in the hogged fuel boiler on each delivery and certify to Ecology annually on the January monthly air emission reporting form that each delivery for the preceding year had a sulfur content of no greater than 2 percent.	WAC 173-410-040(1)(f) and Order No. DE 95AQ-I034 (Attachment B)
2.	Opacity	Average 20 % for any three (3) minutes period in any one hour period except for soot blowing	DOE test method 9 A is the referenced test method. See C.4 for operational requirement. The operational requirement is intended to indicate compliance with the opacity limit.	WAC 173-400-040(1) and Order No. DE 95AQ-I034 (Attachment B)
3.	Particulate	0.1 gr/dscf @ 7 % O ₂	DOE test method 5 shall be performed once per year. The permittee shall perform the Method 5 source test while steam production is above 80 % of the previous month's steam production. The averaging time is the time that each test is run in order to obtain the required volume of sample. The minimum averaging time is 60 minute. The permittee shall record and report the results of the particulate testing by DOE method 5 to Ecology once per year in January for the previous year. See C.4 for operational requirement. The operational requirement is intended to indicate compliance with the particulate limit.	WAC 173-410-040(2)(c)(iii) and Order No. DE 95AQ-I034 (Attachment B)
4.	Operation See C2 and C3 above	--	<p><u>Operational Requirement:</u> The permittee shall continuously monitor and record flow and pressure drop across the hogged fuel boiler's scrubber. The hogged fuel boiler scrubber's flow and pressure drop (delta p), while burning hog fuel, shall be maintained greater than or equal to 605 gallon/minute and 10 inches of water, respectively, other than as provided below. (a) When the hogged fuel boiler scrubber is shut down for any reason, the emission shall continue to meet the 20 % opacity limitation; (b) The Permittee is permitted to perform soot blowing/grate cleaning for 15 minutes at about 0400, 1200, and/or 2000 hours on the hogged fuel boiler without being in violation of the opacity limit. If soot blowing is performed more than one hour from the specified time, the permittee shall record the exception.</p> <p><u>Corrective Action Requirement:</u> When the Permittee encounters conditions that do not meet the Operational Requirement above, Permittee shall, within the shortest practical time but no longer than four hours, take Corrective Action or the Permittee may perform the applicable DOE test method. The permittee shall report all instances where the facility operates without meeting the Operational Requirement, and Corrective Action taken, on the facility's monthly air emission report. Permittee shall not be required to report instances where the scrubber's minimum Operational Requirement is exceeded for less than 3 minutes in any one-hour period. Failure to take corrective actions is a violation of WAC 173-410-040(4) and may be a violation of the underlying requirement.</p>	WAC 173-410-040(4) and Order No. DE 95AQ-I034 (Attachment B)

D. Oxygen Blow tank vent (BP6)

	Parameter	Limit Shall not exceed	Monitoring & Reporting	Applicable Requirements
1.	Volatile organic compounds	34 tons VOC on a carbon basis /year	<p>The permittee shall perform, at least on an annual basis, EPA Method 25 A Modified to confirm the emission factors of VOC per ton of production. EPA method 25A modified is the NCASI methanol (VOC) method. The permittee shall report the results of EPA Method 25 A Modified and the yearly production on the January monthly report. See D.2 for minimum operating/record keeping condition.</p> <p>Annual emissions (ton VOC/year) = sum of annual production (ADUT/year) * emission factor (lbs VOC/ADUT)*ton/2000 lbs.</p> <p>Emission factor (lbs VOC/ADUT) = concentration (mgC/L)*28.32 L/CF*gm/1000 mg*lb/454 gm* air flow by EPA Method 2 (CF/minute) *60 minutes/hour/ production (hour/ADUT)</p>	Order No. 94AQ-I018(Approval conditions (1)) issued under WAC 173-400-113
2.	Record keeping	--	Minimum record keeping for VOC: The permittee shall monitor the production of unbleached pulp produced in air dried tons per day and report the average daily production for the reporting month in the monthly air emission report form. The daily production of pulp shall be used as a minimum operational parameter for VOC emission.	WAC 173-410-062(2)(b) & Order No. 94AQ-I018(Approval conditions (2)) issued under WAC 173-400-113

E. Blow system emission - Nuisance Tower (DB-26)

	Parameter	Limit Shall not exceed	Monitoring & Reporting	Applicable Requirements
1.	Sulfur dioxide	0.2 lbs./ADUT on a fifteen minute average	The permittee shall monitor sulfur dioxide by DOE method 6 modified source test once per month. Modified means that the source test is time adjusted for the average duration of one digester dump that is about 15 minute. The Modified DOE method 6 results divided by the corresponding digester pulp production determines the sulfur dioxide emissions per ADUT. The tons of pulp shall be based on the tons of unbleached pulp per digester dump. See E.2 for operational requirements. The production of pulp during the digester dump shall be taken, recorded, and the amount reported to Ecology with the test results.	WAC 173-410-040(1)(c)
2.	Operation See E1 above	--	<p>Operational Requirement: The permittee shall continuously monitor and record flow to the nuisance tower scrubber. The nuisance scrubber's media flow shall be maintained greater than or equal to 150 gallon/minute average over fifteen minutes.</p> <p>Corrective Action Requirement: When the Permittee encounters conditions that do not meet the Operational Requirement above, Permittee shall, within the shortest practical time, take Corrective Action or as soon as arrangements can be made but not longer than one hour, the Permittee may perform the applicable DOE test method. The Permittee shall report all instances where the facility operates without meeting the Operational Requirement, and Corrective Action taken, on the facility's monthly air emission report. Failure to take corrective actions is a violation of WAC 173-410-040(4) and may be a violation of the underlying requirement.</p>	WAC 173-410-040(4)

F. Mill emission (All emissions from mill except emissions from the power boiler)

	Parameter	Limit Shall not exceed	Monitoring & Reporting	Applicable Requirements
1.	Sulfur dioxide	20 lbs./ day/ADUT	Weyerhaeuser shall calculate the daily average mill emission per the algorithm defined in Appendix C. The averages shall be submitted on the monthly air emission report. Emissions units totaled towards the limit shall have emissions greater than one ton sulfur dioxide per year emission rate. The production shall be the monthly average for that month. The production is required to be taken in section D2 above. The pounds of sulfur dioxide shall be a daily average. The flow used in these calculations shall be based on measurements of the flow taken during stack test each month by DOE method 2. The moisture content shall not exceed the saturation value at the measure stack temperature.	WAC 173-410-040(1)(a) and Order No. DE 95AQ-I034 (Attachment B)

FACILITY-WIDE GENERAL REQUIREMENTS [WAC 173-401-600]

These generally applicable requirements apply facility-wide, including insignificant emission units or activities. Insignificant emission units or activities, however, are not subject to monitoring, testing, recordkeeping, reporting, or compliance certification requirements.

1. The permittee cannot vary the rate of emission of a pollutant according to atmospheric conditions or ambient concentrations of that pollutant, except as directed according to air pollution episode regulations. [WAC 173-400-205]
2. The permittee shall not cause or permit emission of any contaminant if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business. [WAC 173-400-040(5)]
3. The permittee shall not install or use any means that conceal or mask an emission of an air contaminant that would otherwise violate provisions in this permit. [WAC 173-400-040(7)]
4. The permittee shall take reasonable precautions to prevent the release of air contaminants from emission units engaged in material handling, construction, demolition, or any other operation that is a source of fugitive emissions. Reasonable precautions include but are not limited to application of water to paved areas and debris piles as necessary to control fugitive dust or the timely removal or coverage of material piles. [WAC 173-400-040(3)(a)]
5. The permittee shall take reasonable precautions to prevent fugitive dust from becoming airborne and maintain and operate the source to minimize emissions. Reasonable precautions include but are not limited to application of water to paved areas and debris piles as necessary to control fugitive dust or the timely removal or coverage of material piles. [WAC 173-400-040(8)(a)]
6. **The following condition is state-only and is not federally enforceable under the Clean Air Act:** No deposit of particulate matter beyond property line so as to interfere unreasonably with use and enjoyment. [WAC 173-400-040(2)]
7. **The following condition is state-only and is not federally enforceable under the Clean Air Act:** Any person causing odor which may unreasonably interfere with use & enjoyment of property must use recognized good practice and procedures to reduce odors to a reasonable minimum. [WAC 173-400-040(4)]
8. Except where specific requirements are defined elsewhere, the permittee shall assure compliance with conditions 1 through 7 by recordkeeping of actions taken by the permittee in response to complaints received by the permittee or of possible noncompliance noticed by the facility staff in day to day operations. The permittee shall assess the validity of each complaint and commence corrective action, if warranted, as soon as possible but no later than 3 working days of receiving the complaint. The permittee shall keep records of the following: complaints received; the assessment of validity; and what, if any, corrective action was taken in response to the complaint. [WAC 173-401-630]
9. The permittee shall at all times, including periods of abnormal operation and upset conditions, to the extent practicable, maintain and operate any affected facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practice. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to Ecology which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [WAC 173-410-040(4)]

10. Where this permit specifically requires continuous monitoring, the source shall, consistent with the requirements of Ecology's Source Test Manual, calibrate, maintain and operate equipment for continuously monitoring and recording the emissions specified. The source may be temporarily exempted from monitoring and reporting requirements during periods of monitoring system malfunctions, provided that the source shows to Ecology's satisfaction that the malfunction was unavoidable and is being repaired as expeditiously as practicable. [WAC 173-400-105(5)(h)].

Ecology recognizes that monitoring data may be lost for legitimate reasons. The permittee shall make every reasonable effort to acquire, maintain, and recover valid monitoring data. Except where an applicable requirement contains more stringent provisions, permittee shall recover valid monitoring data and recordkeeping for at least 90% of the averaging periods during each month or, if no averaging period is used, collected during each month, in which this permit requires monitoring of a process or parameter. The 10% allowance is contingent on the permittee providing an acceptable explanation for the loss of monitoring data. [WAC 173-401-615]

11. Chemical Accidental Release Program – This stationary source, as defined in 40 CFR section 68.3, may be subject to part 68, the accidental release prevention regulations. If required this stationary source shall submit a risk management plan (RMP) by the date specified in section 68.10. If required this stationary source shall certify compliance with the requirements of part 68 as part of the annual compliance certification per 40 CFR part 70 or 71.
12. Ozone Protection - The permittee shall comply with the applicable standards for recycling and emissions reductions pursuant to 40 CFR Part 82, Subpart F.
 - a. Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to § 82.156.
 - b. Equipment used during the maintenance, service, repair or disposal must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
 - c. Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" is defined at § 82.152.)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant purchased and added to such appliances must do so in compliance with §82.166.
13. For IEUs, the permittee shall comply with WAC 173-410-040(2)(c). [WAC 173-401-530(2)(b)]
14. The permittee will continue to comply with applicable requirements with which the permittee is in compliance. [WAC 173-401-630(3) and 510(2)(h)(iii)(A)]
15. The permittee will meet applicable requirements that become effective during the permit term on a timely basis. [WAC 173-401-630(3) and 510(2)(h)(iii)(B)]

16. National Emissions Standards for Hazardous Air Pollutant from the Pulp and Paper Industry.

- a) Permittee shall comply with the applicable requirements of the National Emissions Standards for Hazardous Air Pollutants from the Pulp and Paper Industry (40 CFR 63.440-458) within three years of the effective date (April 15, 1998) of the rule. [40CFR 63.440(d)]
 - b) Permittee shall submit the initial notification report specified under 40 CFR 63.9(b)(2) within one year after effective date. [40 CFR 63.455(a)]
 - c) The permittee must comply with Subpart A -40 CFR 63 - General Provisions. {40 CFR 63.440(g)}
17. Volatile Organic Liquid Storage Vessels - The permittee shall keep records showing the dimensions and capacities of all storage vessels having capacities greater than or equal to 40 cubic meters that are used to store volatile organic liquids and for which construction, reconstruction, or modification commenced after July 23, 1984. These records are to be kept for the life of each storage vessel. [40 CFR 60.116b (a) and (b)]
 18. **The following condition is state-only and is not federally enforceable under the Clean Air Act.** The permittee cannot burn used oil not meeting standards prescribed in RCW 70.94.610(1). [RCW 70.94.610]
 19. The permittee must comply with 40 CFR sections 61.145 and 61.150 and WAC 173-400-075 if asbestos-containing material is present above specified quantities in a facility being demolished or renovated. [40 CFR Part 61, Subpart M]
 20. Unit-Specific Requirements. The permittee shall conduct routine monitoring of emissions in accordance with the program of monitoring or testing required for specific emission units in conditions A through F of this permit. [WAC 173-410-062].
 21. Unavoidable Excess Emissions. This condition applies, where applicable, to excess emissions that are claimed to be unavoidable pursuant to WAC 173-400-107. The permittee may include in its report demonstrations that excess emissions were unavoidable, consistent with the procedures and criteria of WAC 173-400-107. The permittee shall have the burden to prove that deviations from permit terms were unavoidable. Excess emissions that are unavoidable are excused and are not subject to penalty. [WAC 173-400-107]
 22. Violation Duration. A violation of an emission limit is presumed to commence at the time of the testing, recordkeeping or monitoring indicating noncompliance, and to continue until the time of retesting, recordkeeping or monitoring that indicates compliance. This presumption may be defeated if credible evidence shows that the violation was of longer duration, that there were intervening days during which no violation occurred or that the violation was not continuing in nature. [42 U.S.C. 7413(e)(2)]. The permittee may conduct monitoring or testing more frequently than required by this permit.
 23. Reserved for future use.
 24. Emissions from any unit, other than a recovery system, a blow system or acid plant, shall not exceed 1000 ppm of sulfur dioxide, corrected to seven- percent oxygen in the case of combustion unit, for an hourly average. [WAC 173-410-040(1)(f)]
 25. No person shall cause or permit the emission for more than three minutes, in any one hour, of any contaminant from any emission unit which at the emission point, or within a reasonable distance of the emission point, exceeds twenty percent opacity except,
 - a. When the emission occur due to soot blowing/grate cleaning and the operator can demonstrate that the emission will not exceed twenty percent opacity for more than fifteen

minutes in any eight consecutive hours. The intent of this provision is to permit the soot blowing and grate cleaning necessary to the operation of boiler facilities. This practice, except for testing and trouble shooting, is to be scheduled for the same approximate times each day and ecology or the authority is advised of the schedule.

b. When the owner or operator of a source supplies valid data that the presence of uncombined water is the only reason for the opacity to exceed twenty percent. [WAC 173-400-040(1)]

26. The emissions of particulate from emissions units other than acid plants or recovery systems shall not exceed the following maximum: 0.23 grams per dry cubic meter at standard conditions (0.1 grains/dscf) corrected to seven percent oxygen in the case of combustion units, for units not classified under (c) (i) or (ii) of this subsection. [WAC 173-410-040(2)(c)(iii)]

Recordkeeping Requirements

27. The permittee shall keep records of any periodic and continuous monitoring required by this permit. These records shall include the following, where applicable:
 - a. The date, place as defined in requirement, and time of sampling or measurement;
 - b. The date(s) analysis was performed;
 - c. The company or entity that performed the analysis;
 - d. The analytical techniques or methods used;
 - e. The results of such analysis;
 - f. The operating conditions existing at the time of sampling or measurement.[WAC 173-401-615(2)(a); WAC 173-400-105]
28. The permittee shall keep records describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. [WAC 173-401-724(5).]
29. The permittee shall retain records of all required monitoring data and support information for a period of 5 years from the date of monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [WAC 173-401-615(2)(c)]
30. The permittee shall maintain a contemporaneous record of any deviation from the requirements of this permit. [WAC 173-401-615(3)(b).]

Reporting Requirements [WAC 173-401-520, -615(3), & -710]

31. In addition to any emission unit specific reporting requirements identified below, emission unit specific reporting requirements are identified in conditions A through F.
32. Report within 15 days of the end of each month average daily production of air-dried unbleached pulp. [WAC 173-410-062(2)]
33. Monitoring reports required by this permit must be submitted to Ecology within 15 days of the end of each calendar month. [WAC 173-410-062(2)]. The reports must clearly identify all instances of deviations from permit requirements. [WAC 173-401-615(3)(a)]
34. Submit an inventory of emissions from the source each year no later than 105 days after the end of the calendar year; maintain records of information necessary to substantiate any reported emissions. [WAC 173-400-105(1)]

35. The permittee shall promptly submit a report of any deviations from permit conditions. [WAC 173-401-615(3)(b).]
- a. For purposes of this permit, submitting a report "promptly" means the following: (a) if the deviation presents a potential threat to human health or safety, the report shall be made as soon as possible but no later than 12 hours after the discovery of the deviation; (b) for other deviations, "promptly" means that the deviations are identified in the respective monthly report.
 - b. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. [WAC 173-401-615(3)]. The permittee may include in its report demonstrations that excess emissions were unavoidable, consistent with the requirements of WAC 173-400-107.
36. Certification of truth, accuracy and completeness. Any application form, report or compliance certification required to be submitted by this permit or by Chapter 401 WAC shall contain certification by a responsible official of truth, accuracy and completeness. Where the permit requires reporting more frequently than once every 3 months the responsible official's certification need only be submitted once every 3 months covering all required reporting since the date of the last certification. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [WAC 173-401-520.]
37. All reports and renewal applications required by this permit shall be submitted to:
- Department of Ecology
Industrial Section
P.O. Box 47706
Olympia, WA 98504-7706
38. Compliance Certification. The permittee shall submit a report to the Department of Ecology and to EPA Region 10 twelve months after the effective date of this permit and every year thereafter, within 45 days after the close of the year that the certification covers, certifying compliance with the terms and conditions contained in this permit. The certification shall describe the following:
- a. the permit term or condition that is the basis of the certification;
 - b. the compliance status;
 - c. whether compliance was continuous or intermittent; and
 - d. the methods used for determining compliance. [WAC 173-401-630(5)]

The permittee is not required to certify compliance for insignificant emission units or activities. [WAC 173-401-530(2)(d)]

STANDARD TERMS & CONDITIONS

39. **Duty to Comply.** The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of chapter 70.94 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [WAC 173-401-620(2)(a).]

40. **Need to Halt or Reduce Activity Not a Defense.** It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [WAC 173-401-620(2)(b).]

41. **Permit Actions.** This permit may be modified, revoked, reopened, and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [WAC 173-401-620(2)(c).]

42. **Property Rights.** This permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d).]

43. **Duty to Provide Information.** The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205. [WAC 173-401-620(2)(e).]

44. **Permit Fees.** The permittee shall pay fees as a condition of this permit in accordance with the permitting authority's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in chapter 70.94 RCW. [WAC 173-401-620(2)(f).]

45. **Emissions Trading.** No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit. [WAC 173-401-620(2)(g).]

46. **Severability.** If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable. [WAC 173-401-620(2)(h).]

47. **Permit Appeals.** This permit or any conditions in it may be appealed only by filing an appeal with the pollution control hearings board and serving it on the permitting authority within thirty days of receipt pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA. [WAC 173-401-620(2)(i).]

48. **Permit Continuation.** This permit is issued for a 5 year term; however, this permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2)

shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted. [WAC 173-401-620(2)(j).]

49. Inspection and Entry. Upon consent of the permittee or upon presentation of credentials and other documents as may be required by law, the Department of Ecology or an authorized representative shall be allowed to:
- (1) Enter the source;
 - (2) Have access to and copy at reasonable times any records that must be kept under this permit;
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - (4) As authorized by WAC 173-400-105 and the FCAA, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.[WAC 173-400-105(4); WAC 173-401-630(2).]

PERMIT SHIELD

Compliance with the conditions in this permit is deemed to constitute compliance with applicable requirements as contained in this permit on which the term or condition is based, as of the date the permit is issued. [WAC 173-401-640(1).]

The Department of Ecology has determined that the requirements listed in Appendix A to this permit do not apply to the facility, as of the date the permit is issued, for the reasons specified. [WAC 173-401-640(2)].

APPENDIX A: PERMIT SHIELD/INAPPLICABLE REQUIREMENTS

All inapplicable requirements have not been included in the table below. The requirements that are obviously inapplicable to the pulp mill have been deleted from the table below. The following requirements do not apply to the facility:

Citation	Title or Applicability	Reason(s) for Inapplicability
WAC 173-400-040(1)(c)	20 percent opacity for multiple stacks	The facility does not have any multiple stack connected to a common source
WAC 173-400-040(1)(d)	Alternate opacity limit	The facility does not have any alternative opacity limit
WAC 173-400-040(3)(b) (state and federal versions)	Materials handling, construction, demolition, etc. at emissions unit identified as a significant contributor to nonattainment	The facility is not located in a nonattainment area
WAC 173-400-040(6) Sulfur dioxide	Emission limit of 1,000 ppmv SO ₂ (corrected to 7% O ₂), average of 60 consecutive minutes	This rule is superseded by WAC 173-410-040(1)(f)
WAC 173-400-040(8)(b)	Fugitive dust sources identified as significant contributors to PM-10 nonattainment	The facility is not located in a PM-10 nonattainment area
WAC 173-400-050(1)	Particulate standards	This regulation is preempted by 173-410-040(2)(c)(i)

Citation	Title or Applicability	Reason(s) for Inapplicability
WAC 173-400-050(2)	Incinerator carbonyl emission limit of 100 ppmv total carbonyls	The facility does not have this emission unit.
WAC 173-410-040(1)(b)	Average daily emissions of SO ₂ shall not exceed 4 lbs/air dried ton of unbleached pulp for facilities which do not incinerate sulfite liquor	The facility incinerates sulfite liquor. Regulatory order DE78-103 provides for a limit of 20 lb/ton of pulp, consistent with a facility which incinerates liquor. The inapplicability of this rule is facility-wide.
WAC 173-410-040(1)(e)	Sulfur dioxide limitation (300 ppm, hourly average) for recovery systems constructed after 1/24/72	The recovery system was constructed prior to 1/24/72
WAC 173-410-040(2)(b)	Particulate limitation (0.06 gr/dscf) applicable to recovery systems constructed after 1/24/72	The recovery system was constructed prior to 1/24/72
WAC 173-410-040(2)(c)(ii)	Particulate limitation for combustion units firing other than wood fuel constructed after 1/1/83	The wood-fired combustion equipment was constructed before 1/1/83
WAC 173-410-040(2)(c)(iii)	Particulate limitation for combustion units not classified under (c) (i) or (ii) of this subsection	The facility does not have this type of emission unit
40 CFR Part 60 Subpart D	Fossil-fuel-fired industrial steam generators w/ heat input capacity in excess of 250 MMBtu/hr constructed or modified after August 17, 1971	The hog fuel boiler at Weyerhaeuser - Cosmopolis was not been constructed or modified after this date. Other steam generating units have capacity less than 250 MMBtu/hr
40 CFR Part 60 Subpart Da	Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978	There are no units in this source category that have been constructed after the applicability date.
40 CFR Part 60 Subpart Db	NSPS for Industrial-Commercial-Institutional Steam Generating Units	There are no units in this source category.
40 CFR Part 60 Subpart Dc	NSPS for Small Industrial-Commercial-Institutional Steam Generating Units	Weyerhaeuser - Cosmopolis does not have any units of this size
40 CFR Part 50	National Primary and Secondary Ambient Air Quality Standards	Applies to airsheds
40 CFR Part 53	Ambient Air Monitoring Reference and Equivalent Methods	There are no units in this source category
40 CFR Part 70	State Operating Permit Programs	Administrative and jurisdictional
40 CFR Part 72	Permits (Title IV, Acid Rain)	Administrative and jurisdictional; not this source category
40 CFR Part 73	Sulfur Dioxide Allowance System	There are no units in this source category

Citation	Title or Applicability	Reason(s) for Inapplicability
	(Title IV)	
40 CFR Part 75	Continuous Emission Monitoring (Title IV)	There are no units in this source category
40 CFR Part 77	Excess Emissions (Title IV)	There are no units in this source category
40 CFR Part 82, Except Subparts F	Stratospheric Ozone Protection Regulations	There are no units in this source category
40 CFR Part 85	Control of Air Pollution from Motor Vehicles and Motor Vehicle Engines	There are no units in this source category
40 CFR Part 86	Control of Air Pollution from New and In-Use Motor Vehicles and New and In-Use Motor Vehicle Engines; Certification and Test Procedures	There are no units in this source category
40 CFR Part 88	Clean-Fuel Vehicles	There are no units in this source category

APPENDIX B: Abbreviations used in permit

@	At
AAQS	Ambient Air Quality Standards
ADUT	Air dried unbleached ton (containing no greater than 10 % water)
ADUTD	Air dried unbleached ton per day
CEM	Continuous emission monitoring
CFR	Code of Federal Register
DOE	Department of Ecology
Dscf	Dry standard cubic foot
EPA	Environmental Protection Agency
FCAA	Federal Clean Air Act
Gr	Grains
IEU	Insignificant emission unit
lb(s)	Pound(s)
MVAC	Motor vehicle air conditioning
NSPS	New Source Performance Standard
ppm	Parts per million
ppmv	Parts per million by volume
RCW	Revised Code of Washington
SERP	State Emergency Episode Plan
tdy	Ton per year
VOC	Volatile organic compound
WAC	Washington Administrative Code

Appendix D: Regulatory Orders

- 1. DE 94AQ-I018 (Modified) - Oxygen delignification**
- 2. DE 95AQ-I034 - General Order**
- 3. DE 96AQ-I089 - Concentrated oxygen extraction liquor**